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19 *JoshCo Tech, LLC*

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21 **UNITED STATES DISTRICT COURT**
22 **DISTRICT OF NEVADA**

23

24 JOSHCO TECH, LLC, a Nevada limited
liability company,

25 Plaintiff,

26 v.

27 MAX VA BENEFITS CONSULTING
28 SERVICES, INC. a California corporation;
JOSE BRICENO, an individual,

Defendant.

Case No.: 2:20-cv-00450-APG-EJY

STIPULATION AND ~~PROPOSED~~
ORDER FOR EXTENSION OF TIME
TO FILE OPPOSITION TO
DEFENDANTS' MOTION TO STAY
DISCOVERY PENDING
RESOLUTION OF ITS MOTION TO
DISMISS PLAINTIFF'S COMPLAINT

(First Request)

29 Pursuant to Rule 6 of the Federal Rules of Civil Procedure and District of Nevada Local
30 Rule 6-1, Plaintiff JoshCo Tech, LLC ("JoshCo Tech") and Defendants Max VA Benefits
31 Consulting Services, Inc. ("MaxVA") and Jose Briceno's ("Briceno") (collectively, "Defendants")
32 state the following:

33 1. On July 1, 2020 Defendants filed Defendants' Motion to Stay Discovery Pending
34 Resolution of Its Motion to Dismiss Plaintiff's Complaint ("Motion to Stay") (ECF No. 22);

35 2. Pursuant to Rules 6(a) and (d) of the Federal Rules of Civil Procedure and pursuant
36 to Local Rule 7-2, JoshCo Tech has until July 15, 2020 to file and serve their opposition to the

1 Motion to Stay; and

2 3. On or about July 13, the parties' counsel conferred regarding their schedules, client
3 availability and the general press of business; as a result, JoshCo Tech agreed to provide
4 Defendants a 30-day extension for JoshCo Tech's previously served written discovery responses,
5 and the parties agreed to provide reciprocal extensions on the briefing schedule for the Motion to
6 Stay;

7 4. Accordingly, the parties hereby agree and stipulate that JoshCo Tech shall have up
8 to and through Wednesday, August 5, 2020, to file and serve their opposition to the Motion to
9 Stay and Defendants shall have up to and through September 2, 2020 to file and serve their reply
10 to the Motion to Stay.

11 **IT IS SO AGREED AND STIPULATED.**

12 DATED this 15th day of July, 2020.

13 THE LAW OFFICE OF
14 RICHARD R. RICE

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22 *Attorneys for Defendants,*
23 *Max VA Benefits Consulting Services, Inc.;*
and Jose Briceno

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24 *Attorneys for Plaintiff*
JoshCo Tech, LLC

25 **IT IS SO ORDERED:**

26 
27 Layna J. Zouchal
UNITED STATES MAGISTRATE JUDGE

28 DATED: July 15, 2020